

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

UNITED STATES OF AMERICA,	:	
Plaintiff,	:	Case No. 1:21-MJ-30
vs.	:	Judge Bowman
JUSTIN STOLL,	:	
Defendant.	:	

**UNOPPOSED MOTION TO MODIFY BOND CONDITION**

Now comes Defendant, Justin Stoll, by and through counsel, and respectfully requests that the Court modify the conditions of his release. He is requesting that the court remove location/electronic monitoring and permit travel outside the Southern District of Ohio.

As background, on January 15, 2021, Mr. Stoll made his initial appearance on a criminal complaint charging him with making interstate threats in violation of 18 U.S.C. § 875(c) and threatening a potential witness in violation of 18 U.S.C. § 1512(b)(3). This Court released Mr. Stoll (with no objection from the Government) on an O.R. bond with numerous conditions, to include location/electronic monitoring (GPS), with travel restricted to the Southern District of Ohio, excluding Franklin County. Since his release on bond, Mr. Stoll has had no compliance issues. His pretrial officer states that Mr. Stoll reports as directed, participates in mental health counseling, and follows the directions of his pretrial officer. Given Mr. Stoll's excellent performance on bond and the demands of his job as an interior/exterior painter, Mr. Stoll is requesting that the court remove location/electronic monitoring and permit travel outside the Southern District of Ohio. Neither the government nor the pretrial office has an objection to these

modifications. The parties agree to and suggest the following modification to his travel condition: “Mr. Stoll is permitted to travel in the Southern District of Ohio and the Eastern District of Kentucky without prior approval or notification to his Pretrial Officer. Mr. Stoll is permitted to travel elsewhere within the United States but only with prior approval from his Pretrial Officer.”

Wherefore, Mr. Stoll respectfully requests that the Court modify the conditions of his release as described above.

Respectfully Submitted,

DEBORAH L. WILLIAMS  
Federal Public Defender

s/ Karen Savir  
Karen Savir (KY92002)  
Assistant Federal Public Defender  
Chiquita Center  
250 E. 5th Street, Suite 350  
Cincinnati, Ohio 45202  
(513) 929-4834

Attorney for Defendant  
Justin Stoll

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the Defendant’s Motion to Extend was served electronically upon Assistant United States Attorneys of record, Office of the United States Attorney, 221 E. Fourth St., Suite 400, Cincinnati, Ohio, 45202, this 13th day of April, 2021.

/s/ Karen Savir  
Karen Savir (KY92002)  
Assistant Federal Public Defender